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15 *Jysan Holding, LLC; and*
16 *Jusan Technologies Ltd.*

17 UNITED STATES DISTRICT COURT

18 DISTRICT OF NEVADA

19
20 JYSAN HOLDING, LLC, a Nevada
Limited Liability Company; JUSAN
21 TECHNOLOGIES LTD, an England and
Wales Limited Company;

22 Plaintiff,
23 v.

24 REPUBLIC OF KAZAKHSTAN, a
foreign sovereign state; THE AGENCY
25 FOR REGULATION AND
DEVELOPMENT OF THE FINANCIAL
26 MARKET OF THE REPUBLIC OF
KAZAKHSTAN, a Kazakhstan

Case No. 2:23-cv-00247-JAD-VCF

**STIPULATION TO EXTEND TIME
TO RESPOND TO MOTION TO
DISMISS OR AMEND THE
COMPLAINT
(Second Request)**

Government agency; THE ANTI-CORRUPTION AGENCY OF THE REPUBLIC OF KAZAKHSTAN, a Kazakhstan Government anti-corruption agency; THE FINANCIAL MONITORING AGENCY OF THE REPUBLIC OF KAZAKHSTAN, a Kazakhstan Government agency; THE COMMITTEE FOR NATIONAL SECURITY OF KAZAKHSTAN, a Kazakhstan Government intelligence agency; MADINA ABYLKASSYMOVA, an individual; OLZHAS KIZATOV, an individual; ARMAN OMARBEBKOV, an individual; and ADILBEK DZHAHAKSYBEKOV, an individual, Defendants.

Defendants Madina Abylkassymova, Olzhas Kizatov, and Arman Omarbekov (the “Government Official Defendants”) filed a Motion to Dismiss the Complaint on April 13, 2023 (ECF No. 23). Pursuant to the Court’s Order of April 24, 2023 (ECF No. 26), the current deadline for Plaintiffs Jysan Holding, LLC and Jusan Technologies Ltd (“Plaintiffs”) to respond to the Motion to Dismiss is May 4, 2023. Under Federal Rule of Civil Procedure 15(a)(1)(B), Plaintiffs’ deadline to amend the complaint as a matter of course is May 4, 2023.

Plaintiffs require additional time to respond to the Motion and consider an amendment to the Complaint in light of the complexity of the issues involved. Plaintiffs and the Government Official Defendants have conferred and reached agreement on an extension of each deadline. This is the second stipulation for extension of time to respond to the Motion and the first stipulation for extension of time to amend the Complaint under Fed. R. Civ. P. 15(a)(1)(B).

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1 **IT IS HEREBY STIPULATED AND AGREED** that Plaintiffs' time to respond to the
2 Government Official Defendants' Motion to Dismiss or to amend the Complaint pursuant to
3 Federal Rule of Civil Procedure 15(a)(1)(B) is extended to and including **June 5, 2023**.

4 DATED this 2nd day of May, 2023.

5 MCNUTT LAW FIRM, P.C.

HOLLAND & HART LLP

7 /s/ Daniel R. McNutt

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/s/ J. Stephen Peek

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11 **ORDER**

12 **IT IS SO ORDERED.**

14 _____
15 UNITED STATES DISTRICT JUDGE/
16 UNITED STATES MAGISTRATE JUDGE

17 DATED: _____

18 Case No.: 2:23-cv-00247-JAD-VCF

20 21407389_v1

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